

RICH MAY
A PROFESSIONAL CORPORATION
176 FEDERAL STREET
BOSTON, MASSACHUSETTS 02110-2223
TELEPHONE (617) 482-1360
FAX (617) 556-3889

James M. Avery
Direct Dial: (617) 556-3859
E-Mail: javery@richmaylaw.com

January 24, 2002

Via Hand Delivery

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
One South Station
Boston, MA 02110

Re: Investigation Regarding Increased Penetration Rates for Discounted Electric,
Gas and Telephone Service, D.T.E. 01-106

Dear Secretary Cottrell:

Enclosed please find fifteen (15) copies of the Initial Comments of The Berkshire Gas Company for filing in the above-referenced proceeding. These comments are also being filed in electronic format consistent with the Department's Request for Comments dated December 17, 2001.

Please include the undersigned and Karen L. Zink, Vice President of The Berkshire Gas Company, on the service list in this matter.

Please call me if you have any questions or require further assistance with respect to this matter. Thank you for your consideration.

Very truly yours,

/s/ James M. Avery

James M. Avery

enclosures

cc: Michael Killion, Hearing Officer
Karen L. Zink